

Este documento es muy importante. Si ud. No habla inglés,
busque un traductor o llame al (920) 734-4521.

U.S. Department of Labor Occupational Safety and Health Administration
1648 Tri Park Way
Appleton, WI 54914
Phone: (920) 734-4521 Fax: (920) 734-2661



February 22, 2016

Dear Adam Brotz,

On 08/27/2015, an OSHA compliance officer met with you or your representative as part of an inspection at 2732 North 15th Street Sheboygan, WI 53083. This letter includes the citations for the violations that were found (see summary below). Please choose one of the three options from the box to the right and complete the associated steps found on the following page **within 15 working days**. Please call us if you have any questions about the enclosed citation and/or penalties; we are here to help you choose the best option to resolve your citation as quickly as possible.

Sincerely,

Robert J. Bonack, Area Director

Your Citation Summary
Plastics Engineering Company
Inspection Number: 1087765

Total Amount Due: \$82000.00
Payment Due Date: 15 working days
after receipt of
this letter

You must correct each violation by the date listed in the Citation and Notification of Penalty. Please see the violations and the correction deadline for each violation starting on page 6.

Total Number of Violations : 7
Your First Correction Deadline is: March
30, 2016

Step 1 – Choose a Response
Option and
Act within 15 working days

Respond now before you lose the ability to discuss potential adjustments to penalty amounts and/or due dates. Please choose one option below and complete the steps on the next page.

Option #1 – Discuss with OSHA

I would like to discuss the citation with an OSHA representative. This may lead to changes in the penalty amount, due date or correction deadlines (if appropriate).

Option #2 – Correct and Pay

I agree with the citation, penalties, and correction deadlines, and do not contest.

Option #3 – Contest the Citation

I do not agree with the citation, penalties, and/or correction deadlines, and would like to contest.

Questions or Concerns?

If you have any questions or concerns regarding the citation, penalties, and/or correction deadlines, please call us at (920) 734-4521.

Step 2 – Complete One Option Checklist

Please post a copy of the citation at or near the place where each violation occurred, even if you plan to contest. You can use the checklist to the right to help plan your next steps. Please do not send in your checklist.

Option #1 – Discuss with OSHA

I will complete by:



1. Call: Robert J. Bonack, Area Director, at (920) 734-4521 as soon as possible to schedule a meeting with an OSHA representative that must occur **within 15 working days** of receiving this citation. Bring supporting documentation of existing conditions and corrections done thus far. If necessary, you can still contest the citation after this meeting. ****This meeting does NOT extend your 15 working day deadline to contest the citation.****

 ___ / ___

2. Fill in and post the attached "Notice to Employees OSHA Informal Conference" after scheduling meeting.

 ___ / ___

Option #2 – Correct Violations and Pay Penalty

I will complete by:



1. Correct violations, then complete and mail the attached "Certification of Corrective Action Worksheet" along with the appropriate evidence of repair (e.g. photos, purchase orders, etc.) to the OSHA office listed on the first page, **postmarked within 10 calendar days after each violation's correction deadline and include any required evidence. If these documents are transmitted by means other than mailing, the date the Agency received the documents is the date of submission.**

 ___ / ___

2. Pay the **Total Penalty** by using one of the following methods:
****Include your Inspection Number (see first page) on the payment.****

 ___ / ___

Pay Online: Search "OSHA" on www.pay.gov and complete the "OSHA Penalty Payment Form." Pay by debit, credit or Automated Clearing House (ACH) **within 15 working days**. Penalties over \$25,000 must be paid by ACH and require a Transaction ID (Call 202-693-2170 to obtain one).

Pay by Check: Mail check or money order payable to "DOL-OSHA" for the Total Penalty to the OSHA office listed on the first page **within 15 working days**.

Option #3 – Contest the Citation

I will complete by:



Mail a letter of intent to legally contest to the OSHA office listed on the first page, **postmarked within 15 working days**.

 ___ / ___

U.S. Department of Labor
Occupational Safety and Health Administration
1648 Tri Park Way
Appleton, WI 54914
Phone: 920-734-4521 Fax: 920-734-2661



Citation and Notification of Penalty

To:
Plastics Engineering Company
and its successors
3518 Lakeshore Rd.
Sheboygan, WI 53083

Inspection Number: 1087765
Inspection Date(s): 08/27/2015 - 02/18/2016
Issuance Date: 02/22/2016

Inspection Site:
2732 North 15th Street
Sheboygan, WI 53083

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty **you either call to schedule an informal conference (see paragraph below) or** you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Please refer to the enclosed booklet (OSHA 3000) which outlines your rights and responsibilities and which should be read in conjunction with this form. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

Posting - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. **Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.**

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>.

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will process the payments as if these restrictions or conditions do not exist.

Notification of Corrective Action – For each violation which you do not contest, you must provide ***abatement certification*** to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that ***abatement documentation*** is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an

employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 02/22/2016. The conference will be held by telephone or at the OSHA office located at 1648 Tri Park Way, Appleton, WI 54914 on _____ at _____.

Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1087765

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083
Issuance Date: 02/22/2016

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 1648 Tri Park Way, Appleton, WI 54914**

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review



Citation and Notification of Penalty

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083

Citation 1 Item 1 Type of Violation: **Serious**

29 CFR 1910.119(d)(3)(i)(B): The employer's piping and instrument diagrams were not accurate and did not represent equipment that was existing and was part of the process.

On or about 11/24/2015, the employer's piping and instrument diagrams for the outdoor formaldehyde unloading/storage unit and the Resin Building Kettle 19 unit were not accurate and did not represent equipment that was existing and was part of the process when:

- a) Multiple pieces of equipment on the system, such as but not limited to; valves, strainers, flexible connections, temperature/pressure gages, and temperature/pressure sensors, were not tagged, marked or labeled with information to identify equipment on the system that was represented on the company's P&ID drawings.
- b) Approximately 21 instances occurred where equipment on the PSM covered systems were not documented on the company's P&ID, such as but not limited to; valves, goose necked vapor release lines, temperature sensors, temporary temperature and pressure devices, flexible lines, antifoam/dry additives equipment, piping lines between Kettle 19 and Condenser 19, a line blind, and a temporary valve.
- c) Approximately 10 instances occurred where equipment documented on the company's P&ID were not installed on the PSM covered systems, such as but not limited to; pressure gages, valves, a dead-end pipe section and a section of piping from the truck loading area drawn to a non-existent planned storage tank.
- d) Approximately 3 instances occurred where equipment on the PSM covered systems were not drawn in the correct location on the company's P&ID, such as but not limited to; a line to the sewer from Scale Tank #5 drawn as blanked and disconnected when it was actually connected on the system; finished molten resin tanks (T14, T27, T28, T52) were drawn in the wrong locations; and a drawn 4-way cross section of 4" pipe was actually a 4" Tee section with a 3/4" perpendicular line downstream from the Tee. ~~¶¶e~~
- e) Approximately 7 instances occurred where equipment on the P&ID was identified with the wrong symbol for the part or the symbol was not designated on P&ID legend, such as but not limited to; strainers, valves, lines entering a building from outdoor unloading system, and lines leaving

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1087765
Inspection Date(s): 08/27/2015 - 02/18/2016
Issuance Date: 02/22/2016



Citation and Notification of Penalty

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083

receiver tank 19 didn't designate the adjoining P&ID sheet.

Date By Which Violation Must be Abated:
Proposed Penalty:

03/30/2016
\$5000.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

Citation 1 Item 2 a Type of Violation: **Serious**

29 CFR 1910.119(f)(3): The operating procedures were not reviewed to assure that they reflect current operating practice, including changes that result from changes in process chemicals, technology, and equipment, and changes to facilities and the employer did not certify annually that the operating procedures were current and accurate.

- a) On or about 08/27/2015, the employer had not annually reviewed or certified that operating procedures were current and accurate such as but not limited to; "Outside Work Crews Working In Or On Company Facilities or Grounds" standard safety procedure #6, "Watch Tour Instruction" for the night watchman, Control System Operations Manual for the tank farm and Resin Kettle Log Batch/Formula operating procedures.
- b) On or about 11/19/2015, the employer did not review the written operating procedures for formaldehyde unloading when a management of change (MOC) procedure required a temporary change by "Keep Blocking valve open at vapor return hose for Formaldehyde Unloading" as part of the carbon canister (scrubber) MOC procedure (W/O No. 20156362).

Date By Which Violation Must be Abated: 03/30/2016
Proposed Penalty: \$5000.00

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1087765
Inspection Date(s): 08/27/2015 - 02/18/2016
Issuance Date: 02/22/2016



Citation and Notification of Penalty

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083

Citation 1 Item 2 b Type of Violation: **Serious**

29 CFR 1910.119(l)(5): A change covered by this paragraph resulted in a change in the operating procedures or practices required by paragraph (f) of this section, and such procedures or practices were not updated accordingly:

On or about 11/19/2015, the written operating procedures for the formaldehyde unloading from truck tankers was not updated accordingly when a temporary management of change (MOC) procedure affected the Chem Unloader employee's operating procedures.

Date By Which Violation Must be Abated:

03/30/2016

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

Citation 1 Item 3 a Type of Violation: **Serious**

29 CFR 1910.119(l)(2)(ii): The management of change procedures did not assure that the impact of changes on safety and health were addressed prior to any change.

The employer's management of change (MOC) procedures did not assure that the impact of changes on safety and health were addressed prior to any change when:

- a) On or about 10/26/2015, a temporary MOC procedure to install temperature and pressure sensors in a formaldehyde line to Scale 15 was not reviewed by the safety and health department and did not specifically address the potential impact of changes on safety and health.
- b) On or about 11/19/2015, a temporary MOC procedure to keep a blocking valve open during formaldehyde unloading was not reviewed by the safety and health department and did not specifically address the potential impact of changes on safety and health.
- c) On or about 12/01/2015, a permanent MOC procedure to relocate formaldehyde carbtrol canister was not reviewed by the safety and health department and did not specifically address the potential impact of changes on safety and health.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

03/30/2016
\$7000.00



Citation and Notification of Penalty

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083

Citation 1 Item 3 b Type of Violation: **Serious**

29 CFR 1910.119(l)(2)(iv): The management of change procedures did not assure that the necessary time period for the change was addressed prior to any change.

The employer's management of change (MOC) procedures did not assure that the necessary time period for the changes were addressed prior to any change when:

- a) On or about 11/19/2015, a temporary MOC procedure to keep a blocking valve open during formaldehyde unloading did not include an expected completion date or anticipated time period for the change.
- b) On or about 12/01/2015, a permanent MOC procedure to relocate formaldehyde carbtrrol canister in the formaldehyde unloading area did not include an expected completion date or anticipated time period for the change.

Date By Which Violation Must be Abated:

03/30/2016



Citation and Notification of Penalty

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083

The alleged violations below have been grouped because they involve similar or related hazards that may increase the potential for injury or illness.

Citation 1 Item 4 a Type of Violation: **Serious**

29 CFR 1910.119(m)(5): The employer shall establish a system to promptly address and resolve the incident report findings and recommendations. Resolutions and corrective actions shall be documented.

On or about 08/27/2015, the employer did not establish a system to resolve the incident report findings and recommendations when:

- a) An incident investigation for a release of approximately 5.5 gallons of formalin which occurred on or about 05/16/2013 determined the release was due to a leaking flange. The incident investigation system did not address corrective actions, such as but not limited to mechanical integrity inspections to minimize or eliminate additional releases from leaking flanges or similar equipment.

- b) An incident investigation for a release of approximately 20 gallons of formalin which occurred on or about 06/25/2014 determined the release was due to the pin used to secure the line's cam-lock fitting was not engaged. The incident investigation system did not address corrective actions, such as but not limited to operating procedures reviews or updates or mechanical integrity quality assurance to minimize or eliminate additional misuses of the equipment.

Date By Which Violation Must be Abated:
Proposed Penalty:

03/30/2016
\$5000.00



Citation and Notification of Penalty

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083

Citation 1 Item 4 b Type of Violation: **Serious**

29 CFR 1910.119(m)(6): The Incident Investigation report was not reviewed with all affected personnel whose job tasks were relevant to the incident findings including contract employees where applicable.

On or about 08/27/2015, the employer did not review with all affect personnel whose job tasks are relevant to the incident findings when:

- a) An incident investigation for a release of approximately 5.5 gallons of formalin which occurred on or about 05/16/2013 determined the release was due to a leaking flange.
- b) An incident investigation for a release of approximately 20 gallons of formalin which occurred on or about 06/25/2014 determined the release was due to the pin used to secure the line's cam-lock fitting was not engaged.
- c) An incident investigation for a release of approximately 200-500 gallons of formalin which occurred on or about 01/03/2015 determined the release was due to a leaking valve gasket at the tank farm.
- d) An incident investigation for a release of approximately 5 gallons of formalin which occurred on or about 09/22/2015 determined the release was due to an unseated valve gasket at the tank farm.

Date By Which Violation Must be Abated:

03/30/2016

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1087765
Inspection Date(s): 08/27/2015 - 02/18/2016
Issuance Date: 02/22/2016



Citation and Notification of Penalty

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083

Citation 1 Item 5 Type of Violation: **Serious**

29 CFR 1910.119(n): The emergency action plan did not include procedures for handling small releases.

On or about 08/27/2015, the employer's Emergency Response Plan did not include distinctions of small versus large releases of toxic chemicals such as formaldehyde nor did it include procedures for handling small release from the PSM covered system including, but not limited to, the Outdoor Formaldehyde Unloading station or the indoor reactor Kettles and associated equipment.

Date By Which Violation Must be Abated:
Proposed Penalty:

03/30/2016
\$5000.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1087765
Inspection Date(s): 08/27/2015 - 02/18/2016
Issuance Date: 02/22/2016



Citation and Notification of Penalty

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083

Citation 2 Item 1 Type of Violation: **Willful**

29 CFR 1910.119(o)(1): The employer did not certify that they have evaluated compliance with the provisions of this section at least every three years:

On or about 08/27/2015, the employer did not conduct or certify, at least every three years, that the company had evaluated compliance with the provisions of this section. The employer's most recent audit was a document titled "Process Safety Management Audit" dated August of 2010; the document was not a compliant compliance audit.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	03/30/2016
Proposed Penalty:	\$55000.00

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



Citation and Notification of Penalty

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083

Citation 3 Item 1 Type of Violation: **Other-than-Serious**

29 CFR 1910.119(d)(3)(i)(F): The employer did not include the process safety information of the design codes and standards which were employed.

On or about 08/27/2015, the employer did not include all the process safety information of design codes and standards when:

- a) API 2000 was employed by the company to design and maintain the emergency pressure relief systems.
- b) FM Global standard and equations were employed by the company to size rupture discs.
- c) Foxboro, Beckman and Asco safety instrumentation systems and emergency shutdown systems were employed by the company to read and regulate equipment temperatures and pressures.
- d) FM Global standard was employed by the company to design and maintain the fire detection and suppression systems.
- e) NFPA 12A standard was employed by the company to design and maintain the halon fire suppression system.
- f) Wisconsin SPS 310 standard was employed by the company to design the dike system.
- g) Uninterruptable Power Supply (UPS) standard was employed by the company to size, design and maintain the DCS control systems.

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1087765
Inspection Date(s): 08/27/2015 - 02/18/2016
Issuance Date: 02/22/2016



Citation and Notification of Penalty

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083

Date By Which Violation Must be Abated:
Proposed Penalty:

03/30/2016
\$0.00

A handwritten signature in black ink, appearing to read "Robert J. Bonack", written over a horizontal line.

Robert J. Bonack
Area Director

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration
1648 Tri Park Way
Appleton, WI 54914
Phone: 920-734-4521 Fax: 920-734-2661



INVOICE / DEBT COLLECTION NOTICE

Company Name: Plastics Engineering Company
Inspection Site: 2732 North 15th Street, Sheboygan, WI 53083
Issuance Date: 02/22/2016

Summary of Penalties for Inspection Number	1087765
Citation 1, Serious	\$27000.00
Citation 2, Willful	\$55000.00
Citation 3, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES	\$82000.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. The direct link is <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your

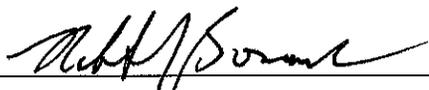
original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to 2 times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

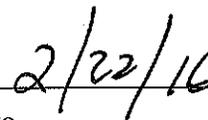
Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



Robert J. Bonack

Area Director



Date